

AUG 08 1991

Mr. Mike Baumhardt  
Senior Manufacturing Technician  
Wells Manufacturing Corporation  
P.O. Box 70  
Fond du Lac, Wisconsin 54935

5HR-12

Re: Land Disposal Restrictions  
Wells Manufacturing Corp.  
WID 006 070 820

Dear Mr. Baumhardt:

On June 5, 1991, the Wisconsin Department of Natural Resources (WDNR), representing the U.S. Environmental Protection Agency, conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above-referenced facility. The purpose of the inspection was to determine the facility's compliance with the applicable hazardous waste management requirements of RCRA, including the Federal land disposal restrictions. The land disposal restrictions for F001-F005 spent solvents and dioxin-containing wastes became effective on November 8, 1986; for California List wastes on July 8, 1987; First Third wastes on August 8, 1988; Second Third wastes on June 8, 1989; and Third Third wastes on May 8, 1990, (40 CFR Part 268 and revisions to 40 CFR Parts 260-265 and 270-271).

With respect to the land disposal restrictions section of the inspection, your facility was found to be in compliance with the requirements. A copy of the inspection report is enclosed for your records.

If you have any questions regarding this correspondence, please contact Sharon R. Travis of my staff at (312) 886-6533.

Sincerely yours,

Paul E. Dimock, Chief  
IL/MI/WI Enforcement Program Section

Enclosure

cc: Barbara Zellmer, WDNR  
Ed Lynch, WDNR  
Dave Edwards, WDNR

bcc: Compliance file

S.TRAVIS:ev:08/02/91:disk #1 RADER/Filename:ANDERSON

SIGNATURE/INITIAL CONCURRENCE REQUESTED - RCRA ENFORCEMENT BRANCH (REB)									
TYP.	AUTH	IL/IN TES CHIEF	MI/WI TES CHIEF	MN/OH TES CHIEF	IL/MI/WI EPS CHIEF	IN/MN/OH EPS CHIEF	REB BRANCH CHIEF	RCRA ASSOC. DIR.	WMD DIVISION DIRECTOR
OK 8-2-91	AT 8-6-91				PSD 8-8-91				

## RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

## I. General Information

Facility: Wells Manufacturing Corp  
 U.S. EPA ID No.: WFD006070820  
 Street: 2-26 N. Brooke St  
 City: Fond du Lac State: WI Zip: 54935  
 Telephone: 414 ~~97~~ 922-5900

Inspection Date: 6/5/91 Time: 09:00 (am/pm)

Weather Conditions: 70's, clear

	<u>Name</u>	<u>Agency/Title</u>	<u>Telephone</u>
Inspectors:	<u>David S. Edwards</u>	<u>WONR</u>	<u>414 485-3016</u>

Facility Representatives: Mike Baumhardt, Wells Mfg 414 922-5900

See Appendix B to determine which of the following LDR waste categories the facility manages:

	<u>Generate</u>	<u>Transport</u>	<u>Treat</u>	<u>Store</u>	<u>Dispose</u>
F001-F005 Solvents	_____	_____	_____	_____	_____
F020-F023 and F026-F028	_____	_____	_____	_____	_____
California List *	_____	_____	_____	_____	_____
First Third [40 CFR 268.10]	<u>✓</u>	_____	_____	_____	_____
Second Third [40 CFR 268.11]	_____	_____	_____	_____	_____
Third Third [40 CFR 268.12]	<u>✓</u>	_____	_____	_____	_____

\* See Appendix A

INSPECTION SUMMARY

Processes That Generate LDR Wastes:

manufacturing of auto ignition parts

LDR Waste Management:

FOO6 - shipped to & treated by Envirite Corp.  
Harvey, FL

DOO1 - shipped to Safety Kleen Corp, Kaukauna,  
WI

Summary:

Signature:



RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

II. WASTE IDENTIFICATION

A. List waste codes which the facility handles in each of the following LDR categories\*:

- 1. F001 through F005 spent solvents:  
\_\_\_\_\_
- 2. F020-F023 and F026-F028 dioxin-containing wastes:  
\_\_\_\_\_
- 3. California List Wastes (See Appendix A):  
\_\_\_\_\_
- 4. First Third Wastes [40 CFR 268.10]:  
F006
- 5. Second Third Wastes [40 CFR 268.11]:  
\_\_\_\_\_
- 6. Third Third Wastes [40 CFR 268.12]\*\*:  
D001

\*See Appendix B.  
\*\* Note: Effective 09/25/90, large quantity generators and TSDs are required to use the toxicity characteristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determining the toxicity characteristic (TC). Small quantity generators must comply with this new requirement by 03/29/91. Wastes which exhibit TC, but do not exhibit EP, will be considered "newly identified" wastes. They will be regulated under 40 CFR Part 268 only after they are evaluated by U.S. EPA, even if they are characteristic for a constituent previously covered under the EP toxicity characteristic [55 FR 22531].

B. Waste Code Determination

- 1. Have all wastes been correctly identified for purposes of compliance with 40 CFR Part 268?\*

Yes ☒ No ☐

If no, list below:

Assigned Classification	Correct Classification
_____	_____
_____	_____
_____	_____

\*Areas of concern include: California List/waste categories with more stringent treatment standards; listed/characteristic; multi-source/single-source leachate; P and U waste codes/F and K wastes; and waste code carry through principle.

Comments: \_\_\_\_\_



2. Have both the listed and characteristic waste code been assigned, where a listed waste exhibits a characteristic? [40 CFR 268.9(a)]

Yes ☐ No ☐ NA ☒

Comments \_\_\_\_\_

3. Has multi-source leachate been assigned the F039 waste code?\* [40 CFR 261.31]

Yes ☐ No ☐ NA ☒

\*Leachate derived exclusively from F020-F023 and/or F026-F028 dioxin wastes retains the individual waste codes.

If yes, was single-source leachate combined to form multi-source leachate? [55 FR 22623]

Yes ☐ No ☐

Comments \_\_\_\_\_

C. Does the facility handle the following wastes (national capacity variances)?

1. F001-F005 contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.30(c)]

Yes ☐ No ☒ List \_\_\_\_\_

2. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.31(b)]

Yes ☐ No ☒ List \_\_\_\_\_

3. California list contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.32(d)(2)]

Yes ☐ No ☒ List \_\_\_\_\_

4. K048-K052 petroleum wastes (nonwastewaters; expires - 11/08/90). [40 CFR 268.35 (b)]

Yes ☐ No ☒ List \_\_\_\_\_

5. Soil and debris contaminated with wastes that had treatment standards based on incineration set in the Second Third rule - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U190, U221, U223, U235 (expires - 06/08/91). [40 CFR 268.34(d)]

Yes ☐ No ☒ List \_\_\_\_\_

6. Soil and debris contaminated with wastes that had treatment standards set in the Third Third rule based on incineration, mercury retorting or vitrification. See Appendix A; (expires - 05/08/92). [40 CFR 268.35(e)]  
Yes ☐ No ☒ List \_\_\_\_\_
7. The following nonwastewaters - F039, K031, K084, K101, K102, K106, P010, P011, P012, P036, P038, P065, P087, P092, U136, U151. (expires -05/08/92). [40 CFR 268.35(c)]  
Yes ☐ No ☒ List \_\_\_\_\_
8. The following wastes identified as hazardous based on a characteristic alone: D004 (nonwastewaters), D008 (lead materials stored before secondary smelting), D009 (nonwastewaters) (expires - 05/08/92). [40 CFR 268.35(c)]  
Yes ☐ No ☒ List \_\_\_\_\_
9. Inorganic solid debris as defined in 40 CFR 268.2(g)\*; includes chromium refractory bricks carrying EPA Hazardous Waste Nos. K048-K052 (expires - 05/08/92). [40 CFR 268.35(c)]  
Yes ☐ No ☒ List \_\_\_\_\_
10. RCRA hazardous wastes that contain naturally occurring radioactive materials (expires - 05/08/92). [40 CFR 268.35(c)]  
Yes ☐ No ☒ List \_\_\_\_\_
11. Wastes listed in 40 CFR 268.10, 268.11, and 268.12 that are mixed radioactive/hazardous wastes (expires - 05/08/92)\*. [40 CFR 268.35(d)]  
Yes ☐ No ☒ List \_\_\_\_\_

\*Note: Incorrect reference [40 CFR 268.2(a)(7)] in Third Third rule.

\*Note: 40 CFR 268.10 and 268.11 wastes incorrectly omitted from this variance in the Third Third rule.

## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## III. GENERATOR REQUIREMENTS

## A. Treatability Group/Treatment Standard Identification\*

\*Note: This information is generally available on LDR notifications. If not, waste profile data and other documentation should be checked.

1. F001-F005 Spent Solvent Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each F-solvent?

Yes ☐ No ☒ NA ☐

If available, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
_____	_____	_____
_____	_____	_____
_____	_____	_____

\*Less than 1% by weight total organic carbon (TOC), or less than 1% by weight total F001-F005 solvent constituents listed in 40 CFR 268.41, Table CCWE. [40 CFR 268.2(f)(1)]

Comments \_\_\_\_\_

2. F020-F023 and F026-F028 Dioxin Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each dioxin waste?

Yes ☐ No ☒ NA ☐

If yes, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
_____	_____	_____
_____	_____	_____
_____	_____	_____

Comments \_\_\_\_\_

\*Less than 1% TOC by weight and less than 1% total suspended solids (TSS) by weight. [40 CFR 268.2(f)]

3. First, Second, and Third Third Wastes:

- a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste?

Yes ☐ No ☒ NA ☐

If available, list each waste code and check the correct treatability group:

Waste Code	Subcategory	Wastewater*	Nonwastewater
<u>P001</u>	_____	_____	<u>Incineration</u>
_____	_____	_____	_____
_____	_____	_____	_____

\* Less than 1% TOC by weight and less than 1% total suspended solids (TSS) with the following exceptions: K011, K013, and K014 wastewaters - less than 5% by weight TOC and less than 1% by weight TSS; K103 and K104 wastewaters - less than 4% by weight TOC and less than 1% by weight TSS. (40 CFR 268.2(f)(2) and (3))

Comments \_\_\_\_\_

- b. Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? [40 CFR 268.9 (b)]

Yes \_\_\_ No ☒ NA \_\_\_

- c. Does the generator specify alternative treatment standards for lab packs?\*

Yes \_\_\_ No \_\_\_ NA ☒

\*Use of the alternative treatment standards is not required. (55 FR 22629)

If yes, do lab packs only contain the following wastes?\* [40 CFR 268.42(c)(2)]

\_\_\_ Organometallics: 40 Part 268, Appendix IV constituents  
\_\_\_ Organics: 40 CFR Part 268, Appendix V constituents

\*Unregulated wastes and hazardous wastes which meet treatment standards may be commingled in the appropriate Appendix IV and V lab pack. (55 FR 22629)

- d. Does the generator specify alternative treatment standards for F039 multi-source leachate?\*

Yes \_\_\_ No \_\_\_ NA ☒

\*Use of the alternative treatment standards is required. (55 FR 22619)

4. California List Wastes: Has the generator correctly identified the treatability group and treatment standard/prohibition level for the following wastes? [55 FR 22675]

- a. Liquid hazardous wastes containing PCBs  $\geq 50$  ppm

Yes \_\_\_ No \_\_\_ NA ☒

If yes, check the appropriate treatability group:

\_\_\_ 50 to 500 ppm PCBs  
\_\_\_  $\geq 500$  ppm PCBs



- b. Listed or characteristic wastes containing  $\geq 1,000$  mg/l (liquids) or mg/kg (non-liquids) HOCs, which are not listed or characterized by the HOC content

Yes ☐ No ☐ NA ☒

If yes, check the appropriate treatability group:

- ☐ Dilute HOC wastewater (1,000 mg/l to 10,000 mg/l HOCs)  
☐ All other HOCs greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non-liquids)

- c. Liquid hazardous wastes that exhibit a characteristic and also contain  $\geq 134$  mg/l nickel and/or  $\geq 130$  mg/l thallium

Yes ☐ No ☐ NA ☒

5. National Capacity Variance Wastes: Have all applicable California List prohibitions been identified for wastes covered under national capacity variances? (See Appendix A.)

Yes ☐ No ☐ NA ☒

If a wastestream contains a mixture of wastes, and a variance only applies to some of the waste codes, has the generator identified all applicable treatment standards and California List prohibitions? (See Appendix A.)

Yes ☐ No ☐ NA ☒

If California List prohibitions apply to wastestreams managed by the generator, complete the following table for each waste code, noting the date on which relevant national capacity variances expire.

Waste Code	Cal List Applicability	Expiration Date
<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>

Comments

6. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in 40 CFR 268.42?

Yes ☐ No ☐ NA ☒

If yes, list the waste code, the technology specified in 40 CFR 268.42, the alternative method, and documentation of approval. [40 CFR 268.42(b)]

Waste Code	Required Technology	Alternative Method	Approval
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

Comments

7. Does the generator mix restricted wastes with different treatment standards for a constituent of concern?

Yes ☐ No ☒

If yes, did the generator select the most stringent treatment standards?  
[40 CFR 268.41(b) and 268.43(b)]

Yes ☐ No ☐

Comments \_\_\_\_\_

B. Waste Analysis

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation?\* [268.7(a)]

Yes ☒ No ☐

\*Note: This determination may be made at the point of disposal if the waste only has a prohibition level in effect.

If no, does the generator ship all restricted wastes as not meeting treatment standards?

Yes ☒ No ☐

Comments \_\_\_\_\_

2. Which of the following analytical methods does the generator employ?\*

\*Note: A "No" answer to applicable questions b. through d. does not necessarily constitute a violation. However, knowledge of waste is rarely adequate if a generator certifies that treatment standard criteria have been met.

- a. Knowledge of waste:

Yes ☒ No ☐

If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. [40 CFR 268.7(a)(5)]

Waptha - recycled by Safety Kleen

- b. TCLP\*: Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using TCLP?\*\* (BDAT\*\*\* = stabilization/immobilization technology)

Yes ☐ No ☒ NA ☐

*appears to use EP-tox.*

\*TCLP = Toxicity Characteristic Leaching Procedure [40 CFR Part 268, Appendix I, EPA Test Method 1311]

\*\*See Appendix C for exceptions.

\*\*\*BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

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- c. Total constituent analysis: Are wastes with treatment standards specified in 268.43 analyzed using total constituent analysis?\* (BDAT = destruction/removal technology)

Yes ☐ No ☐ NA ☒

\*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

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- d. PFLT\*: Was PFLT used to determine if California List constituents were contained in *liquid* hazardous waste?

Yes ☐ No ☐ NA ☒

\*PFLT = Paint Filter Liquids Test [Test Method 9095, EPA Publication No. SW-846]

If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

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3. Does the generator treat restricted wastes in 90-day tanks or containers regulated under 40 CFR 262.34 (permissible in some states)?

Yes ☐ No ☒ (If No, go to 4.)

Does the generator treat the wastes to meet appropriate treatment standards/prohibition levels?

Yes ☐ No ☒

If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted? 40 CFR 268.7(a)(4)]

Yes ☐ No ☒ (If No, go to 4.)

Does the plan fulfill the following? [40 CFR 268.7(a)(4)(i)]

- ☐ Based on a detailed chemical and physical analysis of a representative sample  
☐ Contains information necessary to treat the wastes in accordance with 40 CFR Part 268 requirements



Has the plan been filed with the Regional Administrator (return receipt, Federal Express slip, etc. required for verification)? [40 CFR 268.7(a)(4)(ii)]

Yes ☐No ☒

NA

Comments \_\_\_\_\_

## 4. Dilution Prohibition [40 CFR 268.3]:

- a. Does the generator mix prohibited\* wastes with different treatment standards?

\*See Appendix E for distinction between restricted and prohibited wastes.

Yes ☐ No ☒ (If No, go to b.)

List the wastes \_\_\_\_\_

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ☐ No ☐

Comments \_\_\_\_\_

- b. Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ☐ No ☒ (If No, go to c.)

Check appropriate category:

- ☐ Dilutes to meet treatment standards  
☐ Dilutes to render waste non-hazardous

Do the wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

- ☐ Managed in treatment systems regulated under the Clean Water Act  
☐ Non-toxic\* characteristic wastes  
☐ Treatment standard specified in 40 CFR 268.41 or 268.43

\*Non-toxic = D001(except high TOC nonwastewaters), D002, and D003(except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

- c. Based on an assessment of points a. and b., and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ☐ No ☒

Comments \_\_\_\_\_



5. F039 Multi-source leachate: Has the generator run an initial analysis for all constituents of concern in 40 CFR 268.41 and 268.43? [55 FR 22620]

Yes ☐ No ☐ NA ☒

C. Management

1. On-Site Management

- a. Are restricted wastes treated (other than in a RCRA exempt unit), stored for greater than 90 (small quantity generator\* - 180) days, or disposed on site?

Yes ☐ No ☒

(If yes, the TSD Checklist must also be completed.)

\* Small quantity generator = generator of greater than or equal to 100 kg/mo. but less than 1,000 kg/mo. hazardous waste, or less than 1 kg/mo. acutely hazardous waste

Comments \_\_\_\_\_

- b. If the generator treats characteristic wastes in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ☐ No ☐ NA ☒

- c. If the generator treats characteristic wastes in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?\* [40 CFR 268.9(d)]

Yes ☐ No ☐ NA ☒

\*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

2. Off-Site Management: Waste Exceeds Treatment Standards

- a. Does the generator ship any waste that exceeds treatment standards /prohibition levels (not subject to a national capacity variance) to an off-site treatment or storage facility?

Yes ☒ No ☐ (If No, go to 3.)

Identify waste code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Receiving Facility
D001	Safety Kleen - W#D981187297
F006	Enviro-ite - ILD0311110001

Does the generator provide a notification to the treatment or storage facility?  
[40 CFR 268.7(a)(1)]

Yes ☒ No ☐ (If No, go to 3.)

If the generator specifies alternative treatment standards for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ☐ No ☐ NA ☒

b. Is a notification sent with each waste shipment?

Yes ☒ No ☐

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ☐ No ☐ (If No, go to 3.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ☐ No ☐

### 3. Off-Site Management: Waste Meets Treatment Standards

a. Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility?

Yes ☐ No ☒ (If No, go to 4.)

Identify waste code(s) and off-site disposal facilities:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Does the generator provide a notification and a certification to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ☐ No ☐ (If No, go to d.)

- b. Are a notification and a certification sent with each waste shipment?

Yes ☐ No ☐

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ☐ No ☐ (If No, go to c.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

<u>Waste Code</u>	<u>Subsequent Handler</u>
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification and a certification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ☐ No ☐

- c. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ☐ No ☐ NA ☐ (If No or NA, go to 4.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes ☐ No ☐

4. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

- a. Does the generator ship wastes to a treatment, storage, or disposal facility which are subject to a national capacity variance (40 CFR Part 268, Subpart C), or case-by-case extension (40 CFR 268.5)?

Yes ☐ No ☒ (If No, go to 5.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____



Does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal? [40 CFR 263.7(a)(3)]

Yes ☐ No ☐

b. Is a notification sent with each waste shipment?

Yes ☐ No ☐

If no, is the waste subject to a tolling agreement pursuant to 40 CFR 262.20(e) (small quantity generator only)?

Yes ☐ No ☐ (If No, go to 5.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ☐ No ☐

## 5. Records Retention

Does the generator retain on site copies of all notifications, certifications, and other relevant documents for a period of 5 years? [40 CFR 268.7(a)(6)]

Yes ☒ No ☐

Are copies of relevant tolling agreements, along with the LDR notification and/or certification, kept on site for at least 3 years after expiration or termination of the agreement? [40 CFR 268.9]

Yes ☐ No ☐ NA ☒

Do LDR documents reflect proper management of wastes previously covered under expired national capacity variances, case by case extensions and the soft hammer provision\*?

Yes ☐ No ☐ NA ☒

\*See Appendix B. Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

Comments \_\_\_\_\_



D. Treatment Using RCRA 40 CFR Parts 264 and 265 Exempt Units or Processes

1. Are restricted wastes treated in RCRA exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

distillation units, wastewater treatment tanks, elementary neutralization

NA Yes ☐ No ☐ (If No, do not complete this section.)

List types of waste treatment units and processes:

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Units and Processes</u>
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2. Are treatment residuals generated from these units?

2. Are treatment residuals NA Yes \_\_\_\_ No \_\_\_\_

Comments \_\_\_\_\_

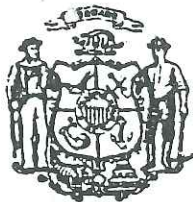
3. Are residuals further treated, stored for greater than 90/180 days, or disposed on site?

3. Are residuals further treated, stored for reuse? NA Yes      No      NA     

(If yes, the TSD checklist must also be completed.)

E. Additional Comments, Concerns, or Issues Not Addressed in the Checklist:

The only question is the treatability information on the Land Disposal Notification/certification form.



State of Wisconsin

Southern District  
3911 Fish Hatchery  
Fitchburg, WI 53711-5397

DEPARTMENT OF NATURAL RESOURCES

Carroll D. Basadny  
Secretary

December 20, 1984

4430

Mr. Richard Lyle  
Wells Manufacturing Company  
26 South Brook Street  
Fond du Lac, WI 54935

Dear Mr. Lyle:

Re: Wells Manufacturing Incorporation EPA ID #WID006070320  
Fond du Lac County

On December 6, 1984, the Southern District Headquarters received a copy of your sites Plant Emergency Organization booklet. This copy was reviewed and some comments were given to you during a phone call on December 13, 1984.

In the conversation you indicated that the emergency coordinator would be the fire marshall. There would be a different fire marshall for each of the three shifts and they would be able to be contacted through the use of a pager system. You would be the second emergency coordinator and in addition there would be five more alternates. It is felt that by signifying the fire marshalls as emergency coordinators, the pertinent requirements would be satisfied. These persons would be familiar with the site activities and contingency plan implementation and be able to carry out all actions necessary to respond to fire, explosion or any plant discharge of hazardous waste to the air, soil or surface water.

The plan contained an excellent description of the facility layout and places where facility personnel would normally work. You stated that you would include the hazardous waste storage area when that issue had been decided upon.

The types of waste handled and their associated hazards is available in a book of toxicological information. This book would be an attachment to the contingency plan. It is requested that you supply a list of the hazardous waste generated at your site as a reference point or an index to this particular book. It would not be necessary to photocopy this entire information. It will be examined during the course of the next generator inspection.

The evacuation plan and procedures for emergency shut-down of facility operations was shown in great detail in the operational handbook. The reporting requirements as noted in NR 181.42(4)(c) should be included in the operation handbook as a guide to the emergency coordinator for reporting on any spill or emergency situation and to facilitate the paper work necessary resulting from the follow-up reports. The rest of the contingency plan meets the requirements of Subchapter III, NR 181 Wis. Admin. Code.

I am returning the booklet and will want the submittal of the finalized copy of the contingency plan.

Thank you very much for your cooperation. If you have any questions or comments, please contact me at (608) 275-3297.

Sincerely,



Wendell Wojner  
Hazardous Waste Specialist

WW:ct

cc: 

Wayne Ringquist - SW/3  
Joe Brusca - SD  
Dave Edwards - Horicon Area



Form Approved OMB No. 158-S79016  
GSA No. 0246-EPA-OT



**INSTRUCTIONS:** If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the **INSTRUCTIONS FOR FILING NOTIFICATION** before completing this form. The information requested herein is required by law (*Section 3010 of the Resource Conservation and Recovery Act*).

INSTALLATION'S EPA I.D. NO.		WID000607 0320
I.	NAME OF INSTALLATION	
II.	INSTALLATION MAILING ADDRESS	
III.	LOCATION OF INSTALLATION	PLEASE PLACE LABEL IN THIS SPACE

## COMMENTS

[illegible]

INSTALLATION'S EPA I.D. NUMBER													APPROVED		DATE RECEIVED (yr., mo., & day)									
S	F	W	I	D	O	O	6	0	7	0	3	2	0	I	A	C	A		8	0	6	9	2	6
1	2												13	14	15		16		17	-		22		

[illegible]

## STREET OR P.O. BOX

C
3 - 26 South Brooke Street
E

CITY OR TOWN															ST.		ZIP CODE				
C	F	o	n	d	u	L	a	c							W	i	5	4	9	3	5
15	16														40	41	42	47			51

## STREET OR ROUTE NUMBER

C																															
5	2	-	2	:	6		S	o	u	t	h		B	r	o	o	k	e		S	t	r	e	e	t						
15	16																														

CITY OR TOWN															ST.	ZIP CODE					
c																					
6	F	o	n	d											W	I	5	4	9	3	5
15	16														40	41	42	47	-		51

## NAME AND TITLE (last, first, &amp; job title)

[illegible]

## A. NAME OF INSTALLATION'S LEGAL OWNER

[illegible]

**B. TYPE OF OWNERSHIP**  
(enter the appropriate letter into box)

<b>F = FEDERAL</b> <b>M = NON-FEDERAL</b>	<b>M</b> <small>36</small>	<input checked="" type="checkbox"/> <b>A. GENERATION</b> <small>57</small>	<input type="checkbox"/> <b>B. TRANSPORTATION (complete item VII)</b> <small>58</small>
		<input type="checkbox"/> <b>C. TREAT/STORE/DISPOSE</b> <small>59</small>	<input type="checkbox"/> <b>D. UNDERGROUND INJECTION</b> <small>60</small>

☐ A. AIR      ☐ B. RAIL      ☐ C. HIGHWAY      ☐ D. WATER      ☐ E. OTHER (specify):

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☒ **A. FIRST NOTIFICATION**

☐ **B. SUBSEQUENT NOTIFICATION** *(complete item C)*

**C. INSTALLATION'S EPA I.D. NO.**

W1D0066070320

Please go to the reverse of this form and provide the requested information.



I.D. - FOR OFFICIAL USE ONLY														
S	W	1	D	0	0	6	0	7	0	3	2	0	2	1
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F 0 0 2	F 0 0 8				
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
7	8	9	10	11	12
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
19	20	21	22	23	24
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
25	26	27	28	29	30
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
37	38	39	40	41	42
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
43	44	45	46	47	48
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☐ 1. IGNITABLE  
(D001)

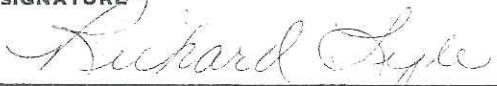
☐ 2. CORROSIVE  
(D002)

☐ 3. REACTIVE  
(D003)

☐ 4. TOXIC  
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE 	NAME & OFFICIAL TITLE (type or print) Richard Lyle Senior Mfg. Engineer	DATE SIGNED 9/25/80
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# Wells

26 South Brooke Street • Fond du Lac, WI 54935 • Phone: (414) 922-5900 • Telex: WELLSFOND 26-2736 • Cable Address: "WELLSFDL"

WID006070320  
motif G

Phone 3-13-81  
AB

January 19, 1981

Mr. Rick Karl  
EPA Regional Office #5  
RCRA Activities  
P.O. Box 7861  
Chicago, Illinois 60680

on X state  
WID006070320

Dear Mr. Karl,

On September 25, 1980, I sent notification to your office in application for an EPA identification number for Wells Mfg. Corp., Fond du Lac, Wisconsin. As a generator of hazardous waste, we are making every effort to comply with current regulations; however, we are storing some toxic wastes while awaiting issuance of the identification number for processing.

Will you please notify me as to the status of our request and give some indication of when we may expect to receive the identification number? For further discussion you may phone me at (414) 922-5900, extension 263.

Very truly yours,

WELLS MFG. CORP.

*Richard Lyle*

Richard Lyle  
Senior Mfg. Engineer

JAN 20 1981

RL:iw

cc: A. Tietz, Mgr., Mfg. Engineering  
J. Barbeau, V.P. Manufacturing  
E. Wuest, Plant Engineer

*1150*